## IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MISSOURI

IN RE:	)		
	)		
SHAWN T. WOODS	)	Case No.	12-45052-CAN7
	)		
Debtor.	)		

## TRUSTEE'S MOTION FOR ORDER COMPELLING DEBTOR'S COMPLIANCE WITH LOCAL RULE 4002-1 AND 11 USC §521(a)(3) AND (4)

COMES NOW, Erlene W. Krigel, Trustee, by and through her attorneys, and moves the Court for its Order compelling the Debtor to comply with Local Bankruptcy Rule 4002-1 and 11 USC §521(a)(3) and (4). In support of her motion, the Trustee states as follows:

- 1. Debtor filed his Petition for relief on December 12, 2012. The meeting of creditors was held and adjourned on January 16, 2013.
- 2. At the meeting of creditors and since, the Trustee has asked the Debtor for copies of his 2012 federal and state filed tax returns as well as turnover of all non-exempt refunds, which are assets of the estate.
- 3. Upon review of such information, the Trustee may request further information from Debtor.
- 4. The Debtor received his discharge on March 20, 2013. If the Debtor does not immediately cooperate with the Trustee, the Trustee will ask the Court to revoke Debtor's discharge.
- 5. The Trustee has incurred \$300.00 in attorneys' fees in making the demands described above and in preparing this Motion. The Trustee requests that the Court order Debtor to pay the Trustee's attorneys' fees in the amount of \$300.00.

WHEREFORE, the Trustee prays for an Order compelling Debtor to immediately provide to the Trustee any information requested by the Trustee pertaining to the estate, specifically turnover of the 2012 federal and state filed tax returns as well as turnover of all non-exempt refunds; for the Trustee's attorneys' fees in the amount of \$300.00; and for such other and further relief as the Court may deem just.

Respectfully submitted,

/s/ Kelsey Patterson Nazar
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ATTORNEYS FOR TRUSTEE

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 21, 2013, a true and correct copy of the above Motion was mailed by U. S. Mail, postage prepaid to:

Shawn T. Woods 903 SE Willow Place Blue Springs, MO 64014

and mailed or emailed to all persons requesting notice through the Court's ECF filing system and was emailed to the Office of the U. S. Trustee.

/s/ Kelsey Patterson Nazar Kelsey Patterson Nazar